

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

SCOTT SULLIVAN, <i>et al.</i>,	§	CASE NO. 4-20-cv-02236
	§	
Plaintiffs,	§	
	§	
vs.	§	<i>Consolidated with:</i>
	§	
STEWART A. FELDMAN, et	§	Case No. 4-21-cv-00658
al.,	§	&
	§	Case No. 4-21-cv-00682
	§	
Defendants.		

UNOPPOSED MOTION TO WITHDRAW AS COUNSEL

L. Andy Paredes respectfully moves this Court for an order recognizing the withdrawal of Mr. Paredes as attorney of record for Jeff Carlson, Capstone Associated Services, Ltd., Capstone Associated Services (Wyoming), Limited Partnership, and Capstone Insurance Management, Ltd. (the “Capstone Parties”),¹ Stephen Friedman, Robert Snyder, and Dana Moore (collectively, the “Directors”).² In support of this motion, undersigned counsel shows as follows:

¹ Mr. Carlson and the Capstone Parties are in Case No. 4-20-cv-02236, Case No. 4-21-cv-00658 and Case No. 4-21-cv-00682. Accordingly, this Motion is being filed in all three cases as it relates to Mr. Carlson and the Capstone Parties and it is in these three matters from which Mr. Paredes moves to withdraw as counsel for Mr. Carlson and the Capstone Parties.

² The Directors are only in Case No. 4-21-cv-00658. They were never made parties to Case No. 4-20-cv-02236 or Case No. 4-21-cv-00682. Accordingly, this Motion is being filed only in Case No. 4-21-cv-00658 as it relates to the Directors and it is only in this matter from which Mr. Paredes moves to withdraw as counsel for the Directors.

1. An attorney may withdraw from representation upon “a showing of good cause and reasonable notice to the client.” *Matter of Wynn*, 889 F.2d 644, 646 (5th Cir. 1989). Withdrawal of counsel “may be effected by motion and order.” S.D. Tex. L.R. 83.2.
2. Good cause exists for Mr. Paredes to withdraw as counsel for Mr. Carlson, the Capstone Parties and the Directors. Mr. Paredes is no longer counsel to Mr. Carlson, the Capstone Parties or the Directors. Further, Mr. Carlson, the Capstone Parties and the Directors do not oppose and consent to the withdrawal and they have each already obtained substitute counsel in their respective proceedings before this Court.
3. Mr. Paredes has provided Mr. Carlson, the Capstone Parties and the Directors with notice of his intent to withdraw, and Mr. Carlson, the Capstone Parties and the Directors have each consented to his withdrawal from these proceedings.
3. Substitute counsel for the Directors has already filed his appearance with this Court. *See* Dkt. 77.
4. Substitute counsel for the Capstone Parties has already filed their appearance with this Court. *See* Dkt. 78.
5. Substitute counsel for Jeff Carlson has already filed their appearance with this Court. *See* Dkt. 80 and 82.

6. Mr. Paredes' withdrawal will cause no delays in these consolidated cases. *See* S.D. Tex. L.R. 83.2 ("no delay will be countenanced because of a change in counsel . . ."). There is no trial date set. Although a motion to lift the recent stay has been granted, and a motion to confirm an arbitration award has been filed, Mr. Paredes has assisted in the transition of these matters to substitute counsel. Accordingly, Mr. Carlson, the Capstone Parties and the Directors will not be prejudiced with Mr. Paredes' withdrawal at this juncture.

CONCLUSION

For the reasons stated above, L. Andy Paredes respectfully requests that the Court enter an Order withdrawing Mr. Paredes as counsel for for Jeff Carlson, Capstone Associated Services, Ltd., Capstone Associated Services (Wyoming), Limited Partnership, and Capstone Insurance Management, Ltd., and Stephen Friedman, Robert Snyder, and Dana Moore, and terminating electronic notices to Mr. Paredes in the above-captioned matter(s).

Respectfully submitted,

/s/ L. Andy Paredes
L. Andy Paredes
Fed. Bar No. 20641
State Bar No. 00788162
510 Bering, Suite 510
Houston, TX 77057-1457
(713) 850-0550
(713) 600-0066 (fax)
aparedes@rslfundingllc.com

**COUNSEL FOR JEFF CARLSON,
CAPSTONE ASSOCIATED
SERVICES (WYOMING),
LIMITED PARTNERSHIP,
CAPSTONE ASSOCIATED
SERVICES, LTD., CAPSTONE
INSURANCE MANAGEMENT,
LTD., STEPHEN FRIEDMAN,
ROBERT SNYDER AND DANA
MOORE**

CERTIFICATE OF SERVICE

I certify delivering a true and correct copy of this Motion to all counsel of record on May 23, 2022, per FED. R. CIV. P. 5 and the Court's electronic filing and notice system.

/s/ L. Andy Paredes

L. Andy Paredes